

AUG - 7 2006

BEFORE THE FEDERAL ELECTION COMMISSION

SECRETARIAT

In the Matter of:

2006 AUG - 7 A 11: 31

Ravenel for U.S. Senate and  
Ben Whaley Le Clercq, in his official  
capacity as treasurer, and  
Thomas Jonathan Jackson Ravenel

MUR 5764

SENSITIVE

GENERAL COUNSEL'S REPORT #2

I. ACTIONS RECOMMENDED

Accept the attached signed conciliation agreement and close the file.

II. BACKGROUND

On June 20, 2006, the Commission found reason to believe that 2004 South Carolina Senate candidate Thomas Jonathan Jackson Ravenel, and his principal campaign committee, Ravenel for U.S. Senate, and Ben Whaley Le Clercq, in his official capacity as treasurer (the "Committee"), violated 2 U.S.C. § 434(a)(6)(B)(iv) and the Committee and Mr. Ravenel violated 11 C.F.R. §§ 400.22(a) and 400.25, respectively, by failing to file timely five 24-Hour Notices of Expenditure from Candidate's Personal Funds for additional expenditures from Mr. Ravenel's personal funds exceeding \$10,000. The Commission also found reason to believe that the Committee violated 2 U.S.C. § 434(b)(2) and (4) by failing to disclose in its original 2003 Year-End Report additional receipts totaling \$33,969.36, a 49% increase, and additional disbursements totaling \$105,121.99, a 24% increase, over the financial activity reported therein.

1 **III. DISCUSSION**

8 **IV. RECOMMENDATIONS**

- 9 1. Accept the attached conciliation agreement with Ravenel for U.S. Senate and Ben  
10 Whaley Le Clercq, in his official capacity as treasurer, and Thomas Jonathan  
11 Jackson Ravenel.  
12  
13 2. Approve the appropriate letter.  
14  
15 3. Close the file.  
16

17  
18 Lawrence H. Norton  
19 General Counsel  
20

21  
22 Rhonda J. Vosdingh  
23 Associate General Counsel  
24

25 8/4/06  
26 Date

27 BY: Susan L. Lebeaux  
28 Susan L. Lebeaux  
29 Assistant General Counsel  
30

31 Claire N. Rajan  
32 Claire N. Rajan  
33 Attorney  
34

35 Attachment

- 36 1. Conciliation Agreement